

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



UNITED STATES DEPARTMENT OF JUSTICE,

Petitioner

v.

Case No. 18-mc-00056

MICHELLE RICCO JONAS,

Respondent

DECLARATION OF ANTHONY J. GALDIERI

I, Anthony J. Galdieri, make the following declaration:

1. I am a Senior Assistant Attorney General with the New Hampshire Department of Justice, Office of the Attorney General (the "NH AG") and, as co-counsel in this case to the Respondent, have personal knowledge of information set forth herein.

2. Attached hereto as Exhibit A-1 is a true and correct copy of the February 28, 2018 subpoena issued by the Drug Enforcement Administration ("DEA") pursuant to 21 U.S.C. § 876, naming "The New Hampshire Prescription Drug Monitoring Program, care of the New Hampshire Office of the Attorney General."

3. Attached hereto as Exhibit A-2 is a true and correct copy of the NH AG's April 9, 2018 Objection to the February 28, 2018.

4. Attached hereto as Exhibit A-3 is a true and correct copy of the June 11, 2018 Subpoena issued by the Drug Enforcement Administration ("DEA") pursuant to 21 U.S.C. § 876, naming "Michelle Ricco Jonas, Program Manager for the NH PDMP."

5. Attached hereto as Exhibit A-4 is a true and correct copy of the NH AG's July 12, 2018 Objection to the June 11, 2018 Subpoena.

6. Attached hereto as Exhibit A-5 is a true and correct copy of an email I sent to the USDOJ requesting a courtesy copy of the petition to enforce.

7. Attached hereto as Exhibit A-6 is a true and correct copy of an email string between myself and the USDOJ indicating that the NH AG would accept service of the petition to enforce on Ricco Jonas, in her official capacity as Program Manager for the New Hampshire Prescription Drug Monitoring Program, requesting a copy of the petition to enforce when the USDOJ explained that it was not serving Ricco Jonas in her official capacity, and being informed that the USDOJ would serve Ricco Jonas at her office at the appropriate time.

I declare under penalty of perjury that the foregoing is true and correct.

Date: September 4, 2018

/s/ Anthony J. Galdieri
Anthony J. Galdieri